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Mr. Francisco Vega
Nevada Division of Environmental Protection
Bureau of Air Pollution Control
901 S. Stewart St., Suite 4001
Carson City, NV 89701-5249

Nevada
Environmental Protection

JAN 23 2008

ENVIRONMENTAL PROTECTION

JAN 28 2008

Dear Mr. Vega:

BAPC / BAQP

The proposed Sierra Pacific Resources (SPR) Ely Energy Center (EEC) project would be located in White Pine County, Nevada. The facility would consist of two new 750 MW supercritical dry-bottom Pulverized Coal (PC) boilers near Ely, Nevada.

The US Forest Service (USFS) concurs with the concerns raised by the National Park Service (NPS) in their letter dated January, 9, 2008, as well as letters submitted by the NPS regarding the proposed White Pine Energy Associates, LLC (WPEA) project dated January 31, 2007, and March 8, 2007. The USFS submits the following comments with the hope that economic development in eastern Nevada will occur in a way that also protects air quality and natural resources.

The USFS administers the Jarbidge wilderness area in northeastern Nevada, a mandatory Class I wilderness area, and 19 Class II wilderness areas within 300 km of the proposed facility including several within 100 km such as High Schells and Mt. Moriah wilderness areas.

Under section 165(d)(B) of the Clean Air Act, (42 U.S.C. § 7475(d)(B)), the USFS has an affirmative responsibility to protect the visibility and other air quality related values (AQRVs) of USFS administered Class I wilderness areas and to consider whether a proposed major emitting facility will have an adverse impact on such values. Our role in the Prevention of Significant Deterioration (PSD) permit process (42 U.S.C. § 7475) is to work with the state of Nevada to ensure that these important air quality attributes in wilderness areas are protected. Wilderness areas near the proposed facility have some of the most pristine air in the country.

The Regional Haze Rule requires progress toward the national visibility goal of no human-caused visibility impairment in Class I wilderness areas. We must ensure that new sources do not adversely impact the visibility in these wilderness areas, or if they do, that those impacts are adequately mitigated.

The USFS is concerned that without adequate mitigation and control technology, the proposed EEC project may adversely impact AQRVs at several Class II wilderness areas and possibly adversely impact the Jarbidge Class I wilderness area. Appendix A9, p70, table 4-4 of the EEC PSD permit application indicates a level of potential impacts at Jarbidge wilderness area that the USFS has determined to be adverse in other PSD permit applications. Furthermore, seasonality (occurrence of impacts in winter) is irrelevant in the determination of potential impacts.



The USFS requests the State of Nevada consider mitigation including, but not limited to, control technology, facility design, and appropriate facility size in permitting new power plants in Eastern Nevada such that air quality related values and natural resources are protected.

If you have questions, please contact Jeff Sorkin, Assistant Regional Air Program Manager for the Intermountain Region and Rocky Mountain Region. He can be reached at 303-275-5759.

Sincerely,



for HARV FORSGREN
Regional Forester